UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	
 EDITH PIRINEA,	X
,	

Plaintiff,

-against-

NOTICE OF MOTION

Case No.: 22-cv-4807

WESTCHESTER DENTAL, P.C. DANIELA HIJAZIN, and EYAD HIJAZIN,

Defendants, -----X

PLEASE TAKE NOTICE, that upon the accompanying Declaration of Michael J. Mauro and the Memorandum of Law submitted herewith, Defendants will move this Court before the Honorable Philip M. Halpern, U.S.D.J., at the United States Courthouse, 300 Quarropas St., White Plains,, NY 10601, for an Order (a) directing Plaintiff and her counsel Jacobs P.C. to pay monetary sanctions and attorneys' fees on Counts I, II, and VII of the Amended Complaint and on all Counts as against Defendant Eyad Hijazin, pursuant to: (i) Fed. Rules of Civ. Pro. 11(c) and 26(g); (ii) 28 U.S.C. § 1927; (iii) and/or the Court's inherent power, and (b) for such other remedies as the Court deems just and proper.

Dated: Lake Success, New York

January 12, 2024

Plaintiff is directed to file her opposition brief, if any, to Defendants' motion for sanctions (Doc. 73) by March 5, 2024 at 5:00 p.m. Defendants' reply, if

any, shall be filed by March 12, 2024 at 5:00 p.m.

SO ORDERED.

Philip M. Halpern

United States District Judge

Dated: White Plains, New York February 20, 2024 N LABUDA LAW GROUP, PLLC

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